

1 Honorable Thomas S. Zilly  
2  
3  
4  
5  
6  
7  
8

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

10 UNITED STATES OF AMERICA, )  
11 Plaintiff, ) Case No. 2:16-cv-1041-TSZ  
12 v. )  
13 DAVID A. GOULD, et al., )  
14 Defendants. )  
15 \_\_\_\_\_ )

16  
17 The United States submits this status report pursuant to the Court's Order of March 10,  
18 2020 (Dkt. 136). That Order stayed this action to allow for progress on settlement efforts.

19 The United States has reviewed the information Defendant Jane Polinder provided last  
20 month. The information appears to resolve the outstanding issues between these two parties.  
21 Counsel for the United States intends to confirm this with Ms. Polinder's counsel, then seek  
22 approval for a final agreement from the appropriate authority at the Department of Justice.

23 The United States anticipates reaching a final resolution with Ms. Polinder in short order.  
24 Once that occurs, the United States will take steps to resolve the remainder of the case.

1 Dated: Nov. 1, 2022

Respectfully submitted,

2 DAVID HUBBERT  
3 Deputy Assistant Attorney General

4 /s/ Charles J. Butler  
5 CHARLES J. BUTLER  
6 Assistant Chief, CTS-Western  
7 Tax Division, U.S. Department of Justice  
8 P.O. Box 683  
9 Washington, D.C. 20044  
202-514-6062 (v)  
202-307-0054 (f)  
Charles.J.Butler@usdoj.gov

10 *Counsel for the United States of America*

## **CERTIFICATE OF SERVICE**

I hereby certify that on Nov. 1, 2022, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic notice to all parties that have appeared in this action.

s/ Charles J. Butler  
CHARLES J. BUTLER  
Assistant Chief, CTS-Western  
Tax Division  
U.S. Department of Justice